

Ismail Ramsey (Cal. Bar No. 189820)
izzy@ramsey-ehrllich.com
Katharine Kates (Cal. Bar No. 155534)
katharine@ramsey-ehrllich.com
RAMSEY & EHRLICH LLP
803 Hearst Avenue
Berkeley, CA 94710
Telephone: (510) 548-3600
Fax: (510) 291-3060

Attorneys for Defendant Benford Chavis

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,)	Case No.: CR-17-00134 HSG
)	
Plaintiff,)	STIPULATION AND ORDER TO
)	CONTINUE STATUS CONFERENCE
vs.)	AND FOR EXCLUSION OF TIME
)	
BENFORD CHAVIS,)	
)	
Defendant.)	
)	
)	
)	

The parties hereby stipulate and ask the Court to find and order as follows:

1. The parties appeared in this case on July 31, 2017, for a status hearing. The Court continued this case for one month to August 28, 201, in order to allow for the production of extensive electronic discovery – more than 100 GB of data.

2. The Government has been working diligently to process data in order to provide TIFF images and load files in accordance with the Guidelines on Electronic

STIPULATION AND ORDER
UNITED STATES V. BENFORD CHAVIS; CR 17-00134 HSG

1 Discovery in Criminal Cases. The effort has taken more time to achieve than the parties
2 initially anticipated, and full discovery has yet to be produced.

3 3. Accordingly, the parties respectfully request that the Court enter an order
4 continuing the current status conference until September 25, 2017, to allow discovery
5 production to be completed.

6 4. Counsel for defendant requests this additional time for effective preparation
7 of counsel, taking into account the exercise of due diligence. The government does not
8 object to the continuance. The parties stipulate, and would ask the Court to so find, that
9 the ends of justice served by continuing the case as requested outweigh the interest of the
10 public and the defendant in a trial within the original date prescribed by the Speedy Trial
11 Act. *See* 18 U.S.C. § 3161(h)(7)(A).

12 5. The parties agree that good cause exists for the extension of time and that
13 the extension would not adversely affect the public interest in the prompt disposition of
14 criminal cases. Therefore, the parties request that the time between August 28, 2017
15 (current date for the status conference), and September 25, 2017 (new date of the status
16 conference), be excluded pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv).

17
18 **SO STIPULATED:**

19 DATED: August 24, 2017

20 /s/
Ismail Ramsey
Katharine Kates
RAMSEY & EHRLICH LLP
Attorneys for William Foote

21
22
23
24 DATED: August 24, 2017

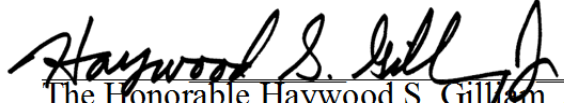
25 /s/
Robin Harris
Special Assistant United States Attorney

26
27
28 **STIPULATION AND ORDER**

UNITED STATES V. BENFORD CHAVIS; CR 17-00134 HSG

1
2 **GOOD CAUSE HAVING BEEN SHOWN, IT SO ORDERED:**

3
4 DATED: August 24, 2017

5 
6 The Honorable Haywood S. Gilliam, Jr.
7 United States District Judge
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

STIPULATION AND ORDER
UNITED STATES V. BENFORD CHAVIS; CR 17-00134 HSG